

AO 91 (Rev. 02/09) Criminal Complaint

Felony

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States of America

v.

Case No.

*B-15-208-MJ**1* Estibaliz Atzimba LOPEZ*2* Jose Maria BETANCOURTUnited States District Court
Southern District of Texas
FILED

Defendant

MAR - 1 2015

CRIMINAL COMPLAINT

David J. Bradley, Clerk of Court

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of February 28, 2015 in the county of Kenedy in the Southern District of
Texas, the defendant violated 21 U.S.C. § Sections 841 and 846,

an offense described as follows:

knowingly and intentionally possess with intent to distribute approximately 1.02 kilograms of cocaine, a Schedule II controlled substance, and did conspire with persons known and unknown to knowingly and intentionally possess with intent to distribute approximately 1.02 kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

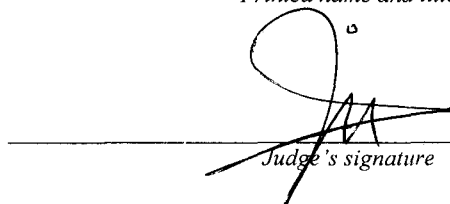
See Attachment A

☐ Continued on the attached sheet.
Complainant's signature

Jose Francisco Chapa, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: March 1, 2015
Judge's signatureCity and state: Brownsville, Texas

Ignacio Torteya III, U.S. Magistrate Judge

Printed name and title

MAR - 1 2015

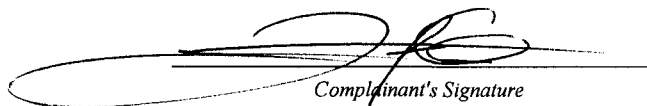
Attachment A

David J. Bradley, Clerk of Court

On February 28, 2015, U.S. Customs and Border Protection, Border Patrol Agents (BPAs) assigned to the Sarita, TX Border Patrol Checkpoint Station encountered Estibaliz Atzimba LOPEZ and Jose Maria BETANCOURT aboard a El Expresso Bus. BPAs had boarded the bus and conducted immigration inspections on the passengers of the bus and a K9 inspection of the luggage compartment of the bus. BPAs received a positive result on the K9 inspection and requested all passengers to exit the bus. BPA noticed LOPEZ displayed nervous behavior and was escorted inside the Border Patrol Station. BPAs observed bulges near LOPEZ's stomach area and LOPEZ stated to agents she had something. A total of four (4) small bundles that field tested positive for the properties of cocaine were discovered and removed from LOPEZ's stomach/abdomen area. The total approximate weight of the four (4) bundles of cocaine was 1.02 kilograms.

LOPEZ informed BPAs another passenger aboard the same bus was involved in this smuggling attempt. LOPEZ described this other person to agents, later identified as BETANCOURT. BPAs encountered BETANCOURT and escorted him inside the Border Patrol Station.

Homeland Security Investigations (HSI), Special Agents (SAs) interviewed LOPEZ and BETANCOURT separately and each stated they were smuggling an unknown amount of drugs to Houston, TX for a person they know as "Eddie". Federal Prosecution for LOPEZ and BETANCOURT was accepted by the U.S. Attorney's Office, Brownsville, TX.


Complainant's Signature

Jose Francisco Chapa, Special Agent

Printed name and title

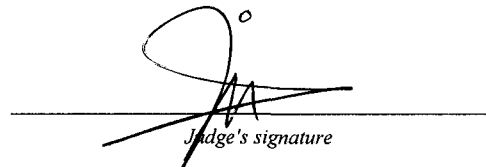
Sworn to before me and signed in my presence.

March 1, 2015

Date

Brownsville, Texas

City and State


Judge's signature

Ignacio Torteya III, U.S. Magistrate Judge

Printed name and title